

Buildings and Facilities Accessible and Usable by Physically Handicapped People, approved February 5, 1986 by the American National Standards Institute, Inc. (ANSI A117.1-1986), which is incorporated by reference into this rule. Each telephone station installed prior to January 5, 1987 shall conform to the above standards by January 1, 1995.

(a) Effective June 1, 1992, where there are two or more telephone stations located in a group, there shall be a minimum of one telephone per group of ten which conforms to the above mentioned standards. The conforming station must be physically located in the group of telephone stations or within a clear line of sight within fifteen (15) feet of the group and free from wheelchair barriers.

(b) Except for locations on floors above or below entry level in buildings not serviced by a ramp or elevator, such stations shall be placed in areas accessible to the physically handicapped.

(c) Stations located in buildings which are not accessible to physically handicapped persons must comply to the above mentioned standards upon modification of the building to make it handicap- accessible, according to the Americans with Disabilities Act.

(15) Effective September 1, 1992, each telephone shall

CODING: Words underlined are additions; words in struck-through type are deletions from existing law.

permit end users to input the additional digits necessary to complete calling card calls, using any locally available carrier, without operator intervention, and to utilize features such as voice mail box and menu driven answering devices. This requirement shall not be applicable to pay telephones located in confinement facilities.

(16) Pay stations located in confinement facilities shall be exempt from the requirements of above subsections (1), (3), (4), (6), and (12). Such pay stations shall also be exempt from the requirements of subsection (5), except for the audible and written 15 minute disconnect notification.

(17) Toll Fraud Liability.

(a) A company providing interexchange telecommunications services or local exchange services shall not collect from a pay telephone provider for charges billed to a line for calls which originated from that line through the use of 10XXX+0, 10XXX+01, 950-1/0XXX+0, or 1-800 access code, or when the call originating from that line otherwise reached an operator position, if the originating line is subscribed to outgoing call screening and the call was placed after the effective date of the outgoing call screening order.

(b) A company providing interexchange telecommunications services or local exchange services shall not collect from a pay

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telephone provider for charges for collect or third number billed
calls. If the line to which the call was billed was subscribed to
incoming call screening and the call was placed after the
effective date of the incoming call screening order.

(c) Any calls billed through the local exchange company or
directly by an interexchange company, or through a billing agent,
which have been identified as not collectible as described in
paragraphs (a) and (b) above, must be removed from any pay
telephone provider's bill after the pay telephone provider gives
notice of the fraudulent charges to the billing party. Such
notice shall be provided to the LEC and IXC in writing no later
than the due date of the bill.

(d) The LEC is responsible for charges described in
paragraph (c) that are associated with the failure of the LEC's
screening services.

(e) The IXC is responsible for charges described in
paragraph (c) that are associated with the failure to properly
validate calls via the appropriate local exchange company data
base.

(f) Definitions: For purposes of this rule the term:

(i) "Effective Date" shall mean the date after the
call screening order was placed and associated charges apply.

(g) Any charges accrued to a subscriber's line when the

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subscriber has paid the local exchange company to screen calls
described in paragraphs (a) and (b) above shall not be the basis
for discontinuance of local and intrastate service.

Specific Authority: 350.127(2), F. S.

Law Implemented: 364.03, 364.035, 364.063, 364.337, 364.345,
F.S.

History: New 1/5/87, Amended 4/14/92, 12/21/92, 2/3/93.

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struck-through type are deletions from existing law.

F.P. WADE, INC.
7820 SW 146 STREET
MIAMI, FL. 33158
(305) 253-7138

October 28, 1992

Rick Moses
Engineering Supervisor
Bureau of Service Evaluation
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL. 32399-0850

RECEIVED

OCT 29 1992

CMU

DEAR Mr. Moses :

Per your request, pursuant to our conversation on Thursday, October 22, 1992, I am forwarding you copies of the disputed charges and the letters from AT&T that accompanied them. Included are both operated assisted and direct dialed calls. I pay for screening and third party block which should protect my phones from all of the disputed operated assisted calls. My phones had been blocked internally from direct dialing long distance international calls at the times of these disputes and I feel the problems allowing customers to make these calls were on Bell or AT&T's side of the interface.

I appreciate the time that you are giving this matter and I look forward to your response.

Sincerely, .

Frederic P. Wade

Frederic P. Wade
President

cc: Steve Anderson-AT&T
Mr. Thomas-Southern Bell
JRW:DC



Account Inquiry Center
5500 Corporate Drive
Pittsburgh, PA 15237
412 369-3000

October 7, 1992

Frederic P. Wade, Inc.
7820 SW 146th Street
Miami, FL 33158

Dear Mr. Wade:

We have been informed by Bell South Telephone, that charges for alleged unauthorized calls billed to your accounts listed on the attached page, et al., have been removed from your bills and recoured back to AT&T.

As Bell South Telephone has informed you, AT&T has the right to rebill recoured charges to the customer.

Customers are responsible for the payment of bills for Long Distance Message Telecommunications Service (LDMTS). This includes payment for LDMTS calls or services originated at the customer's number(s) or accepted at the customer's number(s), (e.g. collect calls).

Reference to the above as well as additional information can be found in Tariff F.C.C. No. 1, Section 2.4 Responsibilities Of The Customer.

It is the policy of AT&T to hold customers responsible for all such calls because it is the customer, not AT&T;

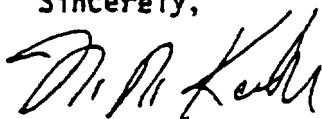
- (A). Who controls the security of access to and egress from the customer's telephone system. Unauthorized calls delivered to AT&T by Local Exchange Companies are indistinguishable from legitimate calls and AT&T has the common carrier duty to complete them. Customers, on the other hand, may prevent these calls by controlling access to and egress from their telephone system.
- (B). Who decides whether to accept the callers' collect calls. If a customer wishes to prevent users from accepting collect calls at the customer's telephones, the customer may, among other protections, 1) request their telephone equipment vendor to install an announcement to alert operators not to complete incoming collect calls, or 2) except for international calls, request toll billing exceptions from the Local Exchange Company.

The attached special bill for \$3,999.00 represents the charges Bell South Telephone originally billed on the statements as indicated and subsequently removed from your regular bills. Payment is due within thirty (30) days and should be remitted as shown on the remittance document.

AT&T is willing to discuss a payment plan for these charges. If there are additional questions regarding this bill, please call Steve Anderson, Recourse Representative, at 1-800-722-6106.

Thank you for your attention to this matter.

Sincerely,



N. R. Kecks
Manager - AIC

NRK/jk

Attachments

cc: E. Herman
S. Anderson

BELLSOUTH TELECOMMUNICATIONS @

IEC/BOC Memorandum RF-1200-1 (2-92)

☒ Initial Recourse
☐ Final Recourse
☐ Manual Threshold

NPA 305 Tel. No. 447-1497

Customer	Coral Way Mobile Inc.		Originator	Bellsouth Telecomm.	
CSR No.	305 253-7138		Address	600 N 19TH ST 23rd FLR	
Bill Name	F.P. Wade Inc		City	B'ham	State AL ZIP 35203
Bill Address	7820 SW 146TH ST		Issued By	Debbie Humphrey	
City	State	ZIP	Date (Mo., Date, Yr.)	Co. Tel. No.	
Miami	FL	33158	07-30-92	205-321-2852	
Bill Date (Mo., Date, Yr.)	06-11-92		Destination Location	AT&T - Recourse	
<input type="checkbox"/> Res. <input type="checkbox"/> Bus. <input checked="" type="checkbox"/> Live <input type="checkbox"/> Final <input checked="" type="checkbox"/> Coin <input type="checkbox"/> Mis.	Street Address		5500 Corporate Dr		
	City	State	ZIP		
	Pittsburgh	PA	15237		

Adjustment Issued By BOC ☒ Call Details Attached

Uncollectible	Amount	\$98.76	Type Claim (Note Explanation in Appropriate Action Field Below) <input checked="" type="checkbox"/> DAK <input checked="" type="checkbox"/> Suspected Fraud <input checked="" type="checkbox"/> International <input checked="" type="checkbox"/> Refusal To Pay <input type="checkbox"/> Other <input type="checkbox"/> Date Calling Card Cancelled
	Federal Tax		
	City/State		
	Special Charge		
	Total	\$98.76	

Authorized To Adjust By IEC ☐ Call Details Attached

Correct Charges	Amount		Amount		Type Claim <input type="checkbox"/> CNC <input type="checkbox"/> WNO <input type="checkbox"/> Serv. Chg. <input type="checkbox"/> DAK <input type="checkbox"/> CTO <input type="checkbox"/> Mo. Rate <input type="checkbox"/> Rate/Time <input type="checkbox"/> PTR <input type="checkbox"/> OC&C <input type="checkbox"/> Rebill <input type="checkbox"/> Coin <input type="checkbox"/> Other <input type="checkbox"/> Flat Adjustment	
	Federal Tax			Federal Tax		
	City/State			City/State		
	Special Charge			Special Charge		
	Total			Total		

Total Adjustment ▶

Action Required
☒ Claim Pending ☐ Claim Closed ☒ Issue Adjustment ☐ OCP ☐ Request Wire Check ☐ Other.

Explanation Of Action Required
Disputed charges. SB providing billing validation, ops failed to validate. Please adjust.
for 090392

Action Taken/Response
[Signature]
J-Y-FR

Service Order Request

SOEC Use Only	Date Received	Date Typed	Typist
NPA	Acct. No.	Cus. Ex.	App.
Due Date	Sis. Code	CS	Ord.

BILL S&E	Action	Quantity	USOC

022 - ...

AT&T **

325 447 1497

943

JUN 11 1992

B

CURRENT CHARGES

MMIG PAGE

4 ATX

TI*

CODES AMOUNT

OPERATOR ASSISTED CALLS

1. MAR 16 1113PM FR SANTODMNGO DR 809 530-3696	3	MIN	RP	9.57
2. MAR 16 1103PM FR SANTODMNGO DR 809 530-3696	21	MIN	RP	28.65
3. MAR 26 1054PM FR SANTODMNGO DR 809 530-3696	11	MIN	RP	16.85
4. MAR 26 1125PM FR SANTODMNGO DR 809 530-3696	6	MIN	RP	12.75
5. MAR 26 1117PM FR SANTODMNGO DR 809 530-2276	10	MIN	RP	16.99
6. MAR 26 1125PM FR SANTODMNGO DR 809 530-2276	6	MIN	RP	12.75
SUBTOTAL				98.76

TOTAL CHARGE FOR ITEMIZED CALLS
AT&T CURRENT CHARGES

98.76

98.76

BELLSOUTH TELECOMMUNICATIONS @

☒ Initial Recourse
☐ Final Recourse
☐ Manual Threshold

IEC/BOC Memorandum RF-1200-1 (2-92)

Customer: <u>Horters of Coconut Grove</u>	Originator: <u>Bellsouth Telecomm</u>
CBR No.: <u>305 253-7138</u>	Address: <u>100 N Pitt St 23rd FLR</u>
Bill Name: <u>FP Wade Inc</u>	City: <u>Birmingham</u> State: <u>AL</u> ZIP: <u>35203</u>
Bill Address: <u>7820 SW 146th ST</u>	Issued By: <u>Debbie Humphries</u>
City: <u>Miami</u> State: <u>FL</u> ZIP: <u>33158</u>	Date (Mo., Date, Yr.): <u>08-29-92</u> Co. Tel. No.: <u>205 321-3852</u>
Bill Date (Mo., Date, Yr.): <u>04-25-92</u>	Destination Location: <u>AT&T Recourse</u>
<input type="checkbox"/> Res. <input type="checkbox"/> Bus. <input checked="" type="checkbox"/> Live <input type="checkbox"/> Final <input checked="" type="checkbox"/> Coin <input type="checkbox"/> Mis.	Street Address: <u>5500 Corporate Dr</u>
	City: <u>Pittsburgh</u> State: <u>PA</u> ZIP: <u>15237</u>

Adjustment Issued By BOC ☒ Call Details Attached

Uncollectible	Amount	<u>30.96</u>	Type Claim (Note Explanation in Appropriate Action Field Below)
	Federal Tax		<input checked="" type="checkbox"/> OAK
	City/State		<input type="checkbox"/> Suspected Fraud
	Special Charge		<input type="checkbox"/> International
	Total	<u>30.96</u>	<input checked="" type="checkbox"/> Refusal To Pay <input type="checkbox"/> Other <input type="checkbox"/> Date Calling Card Cancelled

Authorized To Adjust By IEC ☐ Call Details Attached

Correct Charges	Amount		Uncollectible	Amount		Sustain Rebill	Amount		Type Claim
	Federal Tax			Federal Tax			Federal Tax		<input type="checkbox"/> CNC <input type="checkbox"/> WNO <input type="checkbox"/> Serv. Chg.
	City/State			City/State			City/State		<input type="checkbox"/> OAK <input type="checkbox"/> CTO <input type="checkbox"/> Mo. Rate
	Special Charge			Special Charge			Special Charge		<input type="checkbox"/> Rate/Time <input type="checkbox"/> PTR <input type="checkbox"/> OC&C
	Total			Total			Total		<input type="checkbox"/> Rebill <input type="checkbox"/> Coin <input type="checkbox"/> Other
Total Adjustment ▶									<input type="checkbox"/> Flat Adjustment Rebill Tel. No.

Action Required

☒ Claim Pending ☐ Claim Closed ☒ Issue Adjustment ☐ OCP ☐ Request Wire Check ☐ Other:

Explanation Of Action Required

Disputed charges. Customer request adjustment of 30.96. SB providing billing validation. Please adjust for 10-05-92

Action Taken/Response

Charges are sustained

5500 Corporate Drive
Pgh, Penna. 15237
Sharon L Smith 9-10-92

Service Order Request

SOEC Use Only	Date Received	Date Typed	Typist
NPA	Acct No	Cus. Ex.	App
Due Date	Sis. Code	CS	Ord

BILL	Action	Quantity	USOC
S&E			

024

*RATE APPLIED - SEE BACK OF PAGE

AT&T COMMUNICATIONS

ACCOUNT NUMBER: 305-448-3124 433
BILL DATE: APR 25, 1992
PAGE 5

OPERATOR ASSISTED CALLS

AMOUNT TOTAL

DATE PLACE CALLED

NUMBER CALLED *RATE TIME MIN
537200309 DS .1140AM 31

30.96

30.96

TOTAL CHARGE FOR ITEMIZED CALLS
AT&T CURRENT CHARGES

30.96

30.96

THIS PORTION OF YOUR BILL IS PROVIDED AS A SERVICE TO AT&T. THERE IS NO CONNECTION BETWEEN SOUTHERN BELL AND AT&T. YOU MAY CHOOSE ANOTHER COMPANY FOR YOUR LONG DISTANCE TELEPHONE CALLS WHILE STILL RECEIVING YOUR LOCAL TELEPHONE SERVICE FROM SOUTHERN BELL.
*RATE APPLIED - SEE BACK OF PAGE

NPA 550-2571

IEC/BOC Memorandum

AF-1200-1
(3-45)

Customer <u>W. A. F. Inc.</u>		Originator Loc. <u>NEWARK</u>		B-BOC <u>IEC</u>	
CSR No. <u>550-2571-7132</u>		Address <u>1-1960 W. 4th St. Turley, CA. 94704</u>			
Bill Name <u>W. A. F. Inc.</u>		City <u>NEWARK</u>		State <u>CA</u> Zip Code <u>94704</u>	
Bill Address <u>1-1960 W. 4th St.</u>		Issued By <u>W. A. F. Inc.</u>			
City <u>NEWARK</u> State <u>CA</u> Zip Code <u>94704</u>		Date <u>5-26-91</u>		Co. Tel. No. <u>780 517</u>	
Bill Date <u>5-26-91</u>		Destination Loc. <u>MTS REGULAR-300 HR</u>		BOC <u>IEC</u>	
<input type="checkbox"/> WATS <input type="checkbox"/> Rpt <input type="checkbox"/> Bus <input type="checkbox"/> I/I <input type="checkbox"/> Svc <input type="checkbox"/> Final <input type="checkbox"/> Toll I/I <input type="checkbox"/> Coin <input type="checkbox"/> Mis <input type="checkbox"/> Toll Inter		Address <u>1-1960 W. 4th St. Turley, CA. 94704</u>		City <u>NEWARK</u> State <u>CA</u> Zip Code <u>94704</u>	
Issued By <u>W. A. F. Inc.</u>		Co. Tel. No. <u>780 517</u>		Sales Code <u>550-2571</u> Date <u>5-26-91</u>	

Adjustment Issued By BOC

Amount		Amount <u>1426.2</u>		Amount		Type Claim	
Correct Charges	Federal Tax	Uncollectible	Federal Tax	Sustain* Rebili	Federal Tax	<input checked="" type="checkbox"/> CNC <input type="checkbox"/> WNO <input type="checkbox"/> Other <input checked="" type="checkbox"/> DAK <input type="checkbox"/> CTO <input type="checkbox"/> Serv. Chg. <input type="checkbox"/> Rate/Time <input type="checkbox"/> PTR <input type="checkbox"/> Mo. Rate <input type="checkbox"/> *Rebili <input type="checkbox"/> Coin <input type="checkbox"/> OC&C <input type="checkbox"/> Details Atch. <input type="checkbox"/> WATS <input type="checkbox"/> Gift Cert. <input type="checkbox"/> HOBSIS	
	City/State		City/State		City/State		
	Special Charge		Special Charge		Special Charge		
	Total		Total <u>1426.2</u>		Total		
Total Adjustment		<input type="checkbox"/> Call Details Attachment		Rebili NPA		Rebili Tel. No.	

Authorized To Adjust By IEC

Amount		Amount		Amount		Type Claim	
Correct Charges	Federal Tax	Uncollectible	Federal Tax	Sustain* Rebili	Federal Tax	<input type="checkbox"/> CNC <input type="checkbox"/> WNO <input type="checkbox"/> Other <input type="checkbox"/> DAK <input type="checkbox"/> CTO <input type="checkbox"/> Serv. Chg. <input type="checkbox"/> Rate/Time <input type="checkbox"/> PTR <input type="checkbox"/> Mo. Rate <input type="checkbox"/> *Rebili <input type="checkbox"/> Coin <input type="checkbox"/> OC&C <input type="checkbox"/> Details Atch. <input type="checkbox"/> WATS <input type="checkbox"/> Gift Cert. <input type="checkbox"/> HOBSIS	
	City/State		City/State		City/State		
	Special Charge		Special Charge		Special Charge		
	Total		Total		Total		
Total Adjustment		<input type="checkbox"/> Call Details Attachment		Rebili NPA		Rebili Tel. No.	

Action Required

<input type="checkbox"/> Claim Pending	<input type="checkbox"/> Issue Adjustment	<input type="checkbox"/> Request Wire Check	<input type="checkbox"/> Calling Card	<input type="checkbox"/> OCP
<input type="checkbox"/> Claim Closed	<input type="checkbox"/> Investigate	<input type="checkbox"/> Mail	<input type="checkbox"/> Gift Certificate	
<input type="checkbox"/> Sustain/Rebili		<input type="checkbox"/> Other	<input type="checkbox"/> BNS	

Explanation Of Action Required Transfer of Adjustment
from 550-2571-7132 to 550-2571-7133

Action Taken/Response

Service Order Request

BOEC Use Only		Date Received		Date Typed		Type	
NPA	Acct. No.	Cus	Ex	App	Due Date	Sis. Code	CS
					X		
... BILL							
... S & E	Action	Quantity	USOC				

•AT&T COMMUNICATIONS

PPD

CBAL

320.89

					MIN RATE	INSBLC X	AMT
16.APR15	658P TO IRVING	TX214	650-0002	1	E	& JB2D	.14
Subtotal							9.22
Operator Assisted Calls							
17.MAR24	723P TO NASSAU	BA809	326-8387	3	TS	1RLB20	5.92
18.MAR27	1227A TO HOLLYWOOD	FL305	920-4818	2	NS	1R8B20 J	1.79
19.MAR27	1229A TO HOLLYWOOD	FL305	920-4818	1	NS	1R8B20 J	1.70
20.MAR27	702A TO NEWPROVDNC	BA809	361-3367	11	YS	1RLB20	10.00
21.MAR27	714A TO CAMPERTOWN	BA809	324-1722	22	YS	1RLB20	15.61
22.MAR27	737A TO NASSAU	BA809	325-2416	18	YS	1RLB20	13.57
23.MAR27	913A TO FT LAUDERDL	FL305	748-2808	6	DS	1R8B20 J	2.80
24.MAR27	926A TO NASSAU	BA809	393-6132	27	RS	1RLB20	24.64
25.MAR27	958A TO HOLLYWOOD	FL305	920-4818	3	DS	1R8B20 J	2.04
26.MAR27	930P TO TITUSVILLE	FL407	269-3406	19	ES	1R8B20 J	4.32
27.MAR27	949P TO LAKE WALES	FL813	678-9386	13	ES	1R8B20 J	3.21
28.MAR27	1002P TO FT LAUDERDL	FL305	486-9311	7	ES	1R8B20 J	2.58
29.MAR27	1009P TO DELRAY BCH	FL407	278-8029	11	ES	1R8B20 J	3.14

305 557 0571 539 ITEM 04-26-91 E 100030/00037 MMIP 2SM NP
 BOS056-CURRENT STATUS BILL EXISTS
 BN1 FONE LEASING INC PB 0521 RTA 78 TAX 0000 ESA Y CC B 9 LI'
 BA2 7820 SW 146TH ST RA NT P CSN TAR 000700 NOB 1 DEP 08-89
 PO MIAMI FL 33158 RB 521 CT TCL DOI 1186
 PPD CBAL 320.89

•AT&T COMMUNICATIONS

					MIN RATE	INSBLC X	AMT
30.MAR27	1022P TO NASSAU	BA809	326-8387	1	TS	1RLB20	5.92
Operator Assisted Calls (continued)							
31.MAR27	1023P TO NASSAU	BA809	326-8387	2	TS	1RLB20	5.92
32.MAR27	1026P TO FT LAUDERDL	FL305	733-4165	5	ES	1R8B20 J	2.30
33.MAR29	1103A TO NEWPROVDNC	BA809	361-4026	1	RS	1RLB20	5.92
34.MAR29	1106A TO NASSAU	BA809	325-2416	11	RS	1RLB20	12.16
35.MAR29	1121A TO FT LAUDERDL	FL305	791-8605	3	DS	1R8B20 J	2.19
36.MAR29	427P TO NASSAU	BA809	326-8387	22	RS	1RLB20	20.74
37.MAR29	818P TO FT LAUDERDL	FL305	646-6454	4	ES	1R8B20 J	2.15
Subtotal							148.62

Total Charge For Itemized Calls 157.84
 AT&T Current Charges

157.84

305 | 594-7804

IEC/BOC MEMORANDUM

4-851

Customer 79TH SHOP		Originator Loc. BELLSOUTH TELECOM		BOC <input type="checkbox"/> IEC <input type="checkbox"/>	
SR No. 305 253-7138		Address 600 N 19TH ST FLR 23			
Name FREDERIC P WADE INC		City Birmingham AL		State Zip Code 35203	
Address 7820 SW 146TH ST		Issued By JOAN THOMAS			
City MIAMI		State FL		Zip Code 33158	
Date 4-17-92		Destination Loc. AT+T CENTRALIZED RECURSE		BOC <input type="checkbox"/> IEC <input type="checkbox"/>	
<input type="checkbox"/> WATS <input type="checkbox"/> Res <input type="checkbox"/> Bus <input type="checkbox"/> IN <input type="checkbox"/> Ltg <input type="checkbox"/> Final <input type="checkbox"/> Toll 1/N <input type="checkbox"/> Coin <input type="checkbox"/> Mls <input type="checkbox"/> Toll Inter		Address 233 MT AERY Rd Rm 2321 BASKING RIDGE NJ 07020		City BASKING RIDGE NJ 07020	
		Co. Tel. No.		Sales Code	
		Date 5-12-92		Co. Tel. No. 205 321-2411	

Adjustment Issued By BOC

Correct Charges		Uncollectible		Sustain* Rebill		Type Claim		
Amount		Amount		Amount		<input type="checkbox"/> CNC	<input type="checkbox"/> WHO	<input type="checkbox"/> Other
Federal Tax		Federal Tax		Federal Tax		<input type="checkbox"/> DAK	<input type="checkbox"/> CTO	<input type="checkbox"/> Serv. Chg.
City/State		City/State		City/State		<input type="checkbox"/> Rate/Time	<input type="checkbox"/> PTR	<input type="checkbox"/> Mo. Rate
Special Charge		Special Charge		Special Charge		<input type="checkbox"/> *Rebill	<input type="checkbox"/> Coin	<input type="checkbox"/> OC&C
Total		Total		Total		<input type="checkbox"/> Details Asch.	<input type="checkbox"/> WATS	<input type="checkbox"/> Glt. Cart.
Total Adjustment		<input type="checkbox"/> Call Details Attachment		Rebill NPA		Rebill Tel. No.		

Authorized To Adjust By IEC

Correct Charges		Uncollectible		Sustain* Rebill		Type Claim		
Amount		Amount		Amount		<input type="checkbox"/> CNC	<input type="checkbox"/> WHO	<input type="checkbox"/> Other
Federal Tax		Federal Tax		Federal Tax		<input type="checkbox"/> DAK	<input type="checkbox"/> CTO	<input type="checkbox"/> Serv. Chg.
City/State		City/State		City/State		<input type="checkbox"/> Rate/Time	<input type="checkbox"/> PTR	<input type="checkbox"/> Mo. Rate
Special Charge		Special Charge		Special Charge		<input type="checkbox"/> *Rebill	<input type="checkbox"/> Coin	<input type="checkbox"/> OC&C
Total		Total		Total		<input type="checkbox"/> Details Asch.	<input type="checkbox"/> WATS	<input type="checkbox"/> Glt. Cart.
Total Adjustment		<input type="checkbox"/> Call Details Attachment		Rebill NPA		Rebill Tel. No.		

Explanation Of Action Required

☐ Other☐ Calling Card
☐ BNS☐ OCP

ad just ment 3/138 Disputed charge - customer request
 upon failed to validate. Please adjust
 pending billing validation

Action Taken/Response

Service Order Request

A Acct. No.		Cue		App		Due Date		Sta. Code		CS		Ord	
BILL		Action		Quantity		UBOC							
S & E													

COPY 1 - IEC

-19-

029

31.38

Commissioners:
THOMAS M. BEARD, CHAIRMAN
BETTY EASLEY
J. TERRY DEASON
SUSAN F. CLARK
LUIS J. LAUREDO



HUT 11
DIVISION OF COMMUNICATIONS
WALTER D'HAESELEER
DIRECTOR
(904) 488-1280

Public Service Commission

November 4, 1992

AT&T Communications of the Southern States, Inc.
Ms. Doris Franklin
106 East College Avenue, Suite 1420
Tallahassee, Florida 32301-1841

Dear Ms. Franklin:

The purpose of this letter is to learn AT&T's position with respect to specific forms of toll fraud as it affects the telephone industry and the attached complaint of Frederic P. Wade, Inc. against AT&T. In this regard, my inquiry relates only to the charges for calls originated with an AT&T operator from pay telephones subscribed to LEC originating operator screening and to calls terminated via AT&T to a pay telephone subscribed to LEC billed number screening. To assist in this matter, I have attached examples from Mr. Wade's complaint including intrastate, interstate and international calls which apparently were completed by AT&T despite the operation of LEC screening services to stop such calls. Relevant AT&T correspondence to the pay telephone provider is also attached. Although Mr. Wade also disputes charges for direct dialed calls to Area Code 809, you need not address this aspect of the dispute.

Please respond to the following questions about the attached documents by December 4, 1992.

1. For the originating operator assisted calls, describe what efforts AT&T has made to learn whether the LEC's originating operator screening failed or whether AT&T's operators failed to act on the screening information. Indicate what was learned.
2. For the terminating collect and third number billed calls, describe what efforts AT&T has made to learn whether the LEC's validation data base was in error or whether the calls were not validated. Indicate what was learned.
3. Provide AT&T's policy with respect to originating operator and billed number screening services. For calls billed by AT&T, indicate when originating screen codes are and are not used and when billed number screening is and is not used.

4. Indicate which, if any, of the calls described in the attachments have been, or will be, adjusted by AT&T.

5. Describe what disposition would be made of these same charges if they had originated or terminated at an AT&T pay telephone under the same circumstances. Are the fraudulent charges assigned to Pay Telephone Operations or to Long Distance Operations. Please identify where such intrastate charges appear if reported to the FPSC. If the process is different for interstate and international, explain.

6. In paragraph (A) of AT&T's October 7, 1992, letter to Mr. Wade (copy attached), AT&T states "Unauthorized calls delivered to AT&T by Local Exchange Companies are indistinguishable from legitimate calls and AT&T has the common carrier duty to complete them." Does AT&T distinguish between calls delivered to AT&T by LECs with a screen code indicating an AT&T pay phone versus a screen code indicating a privately owned pay telephone? If the LECs pass appropriate screen codes with the originating call, please explain why such calls are not distinguishable from legitimate calls.

7. In the same paragraph referenced in 6 above, AT&T states "Customers, (meaning pay telephone providers) on the other hand, may prevent these calls by controlling access to and egress from their telephone system." This is true. The pay telephone provider could block all forms of access to AT&T, including zero minus and 10288+0 calls. Please explain AT&T's statement and reconcile it with AT&T's efforts at the state and federal level to ensure that all end users have access to AT&T. Does AT&T recommend this form of controlling access to and egress from private pay telephones? If not, what form of controlling access to and egress from private pay telephones does AT&T advocate?

8. In paragraph (B) of the previously mentioned AT&T letter, AT&T states "If a customer wishes to prevent users from accepting collect calls at the customer's telephone, the customer may, among other protections 1) request their telephone equipment vendor to install an announcement to alert operators not to complete incoming collect calls, or 2) except for international calls, request toll billing exceptions from the Local Exchange Company." Part 2 of the previous sentence suggests that intrastate and interstate terminating collect toll calls can be avoided by the pay phone provider with the purchase of intrastate regulated billed number screening from the LEC. Please advise why AT&T appears to be billing Mr. Wade for such calls? With respect to AT&T's Tariff F.C.C. No. 1, Section 2.4 Responsibilities Of The Customer, please indicate if the tariff language applicable to Mr. Wade has been mandated by the F.C.C. Please explain why AT&T cannot change the tariff to recognize the newly competitive pay telephone environment in effect today.

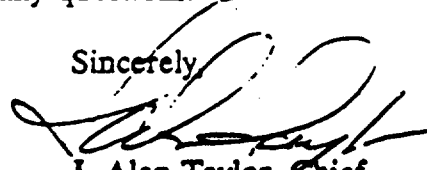
9. Please provide a copy of all comments made by AT&T to the F.C.C. related to originating line screening and billed number screening in CC Docket No. 91-35. Please include AT&T's position as to what jurisdiction the tariffs should be filed in and what jurisdictional calls should be screened.

10. If the Florida Public Service Commission, through its enforcement program, requires hotels, motels and hospitals to unblock access to AT&T, will AT&T pursue collection of fraudulent calls from the hospitality industry, as it is the pay telephone industry, even if the hotels, motels and hospitals purchase originating line screening and billed number screening from the LEC? If so, please explain why the F.P.S.C. should pursue such enforcement. If not, please explain.

Finally, please address the fundamental fairness issue. Why is it not fair, to all segments of the industry, for the pay phone provider to have an obligation to purchase LEC screening services, for LECs to be obligated to ensure that the screening services operate properly, and for IXCs to have an obligation to act on the LEC screening services, regardless of the jurisdictional nature of a call. Why is it not fair for the industry segment failing to carry out its obligation to absorb any resulting fraudulent charges.

Feel free to contact me if you have any questions.

Sincerely,



J. Alan Taylor, Chief
Bureau of Service Evaluation

Attachments

c: Rick Moses



Doris Franklin
Manager-Regulatory Affairs

Suite 1420
106 East College Avenue
Tallahassee, Florida 32301
904 425-6349

December 4, 1992

RECEIVED

DEC 4 1992

CMU

Mr. J. Alan Taylor
Division of Communications
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

Dear Mr. Taylor:

Enclosed is the response of AT&T Communications of the Southern States, Inc. to your November 4, 1992, letter concerning toll fraud and the complaint of Frederick P. Wade, Inc.

Because Mr. Wade's bills involve both domestic and international calls, in its response AT&T is providing information on both types of calls. AT&T notes, however, that the jurisdiction of the Florida Public Service Commission does not extend to interstate and international calls.

If you have any questions, please call me at 425-6349.

Yours very truly,

Doris M. Franklin

Doris M. Franklin

Attachment

cc: Mr. Jack Spooner
Mr. Mike Tye

034

- 14 -

RESPONSES TO FLORIDA PUBLIC
SERVICE COMMISSION'S QUESTIONS

1. For the originating operator assisted calls, describe what efforts AT&T has made to learn whether the LEC's originating operator screening failed or whether AT&T's operators failed to act on the screening information. Indicate what was learned.

Response: Although the calls which are the subject matter of these data requests occurred over six months ago and it is difficult to recreate the conditions under which they were processed, AT&T's records indicate the lines were not identified as pay phone lines. ANI 07 II digits were not indicated.

2. For the terminating collect and third number billed calls, describe what efforts AT&T has made to learn whether the LEC's validation data base was in error or whether the calls were not validated. Indicate what was learned.

Response: See response to No. 1 above.

3. Provide AT&T's policy with respect to originating operator and billed number screening services. For calls billed by AT&T, indicate when originating screen codes are and are not used and when billed number screening is and is not used.

Response: Originating Line Screening (OLS): The LECS provide originating line screening services through general exchange tariffs. The service is provided to aggregators: COCOTs, hotels, motels, colleges, universities, hospitals, etc. Once purchased by the aggregator, the screening information is forwarded to the interexchange carrier (IXC) on calls which originate from that line number. OLS indicates to the IXC operator that sent paid calls are not to be billed back to the originating line. OLS is provided to IXCs by the LECs as part of the Automatic Number Identification (ANI) signaling protocol through a two digit code known as the Information Digits (II). When OLS is subscribed to by the aggregator, the IXC receives ANI 07 II with the calls originating from the aggregator's line.

AT&T's operators are required to respond to the ANI 07 II that indicate restrictions on a line. AT&T's Operator Services Position System (OSPS) cannot technically allow sent paid calls to be billed to that line based on this ANI 07 II.

Billed Number Screening (BNS): This service is provided by the LECs to aggregators, as well as residents and business end-users. This service advises the operator of the desire by the customer to restrict collect and/or third number billed calls to that customer's telephone line.

On all domestic calls AT&T's OSPS check whether there are restrictions on the line for collect and third number billed calls. This process requires a "dip" into the LEC's Line Information Database (LIDB) for verification about the restrictions on the line. If the query reply indicates that the call should not be billed to that number, the operator will get an indication that the billing should be denied and the operator will seek alternate billing arrangements from the calling party. For collect calls if the called number indicates no restrictions, the AT&T operator must receive affirmative confirmation from the called party that they will accept the charges. If this is not received, the operator must ask for alternate billing arrangements or the call will be denied.

On international calls the actual call handling process used to complete the bill collect calls from foreign destinations to U.S. telephones varies from country to country. In the vast majority of countries, however, the person overseas who initiates the call reaches an operator who is an employee of the foreign PTT. Upon receipt of the information concerning the called number and the requested method of billing, the PTT operator determines whether or not validation is required. In making this decision, the PTT operator relies upon the internal operating procedures established by the PTT. If the PTT operator determines that validation is necessary, the PTT operator will dial into an AT&T operator center in order to determine whether or not any restrictions have been placed on the line number to which the call will be billed. The AT&T operator checks the number in LIDB and advises the PTT operator whether or not any restrictions are applicable. Based on this information, the PTT operator then determines whether or not to proceed with the call. If the PTT operator decides to go forward with the call, the PTT operator dials the number in the United States

and secures acceptance of the billing arrangement and connects the call. These calls are billed in the United States by AT&T.

AT&T has a new service, U.S.A. Direct, which provides AT&T operator services for inbound collect calls to the United States from foreign countries. As this process replicates the domestic call handling, it should reduce the concerns associated with calls handled by PTT operators.

As part of the Toll Fraud Prevention Committee, in which IXCs and LECs participate, a resolution to adopt the 8000 and 9000 numbering scheme has been adopted for all pay phones on a going-forward basis starting January 1, 1993. This will provide foreign operators a way to recognize pay phones in the United States. Pay phones that have experienced fraudulent calling can ask for an 8000 or 9000 number.

4. Indicate which, if any, of the calls described in the attachments have been, or will be, adjusted by AT&T.

Response: None

5. Describe what disposition would be made of these same charges if they had originated or terminated at an AT&T pay telephone under the same circumstances. Are the fraudulent charges assigned to Pay Telephone Operations or to Long Distance Operations. Please identify where such intrastate charges appear if reported to the FPSC. If the process is different for interstate and international, explain.

Response: Because of the differing status of AT&T pay phones, which are part of AT&T's network, the calls could not have occurred under the same circumstances. As a result of this, AT&T is unable to answer.

6. In paragraph (A) of AT&T's October 7, 1992, letter to Mr. Wade (copy attached), AT&T states "Unauthorized calls delivered to AT&T by Local Exchange Companies are indistinguishable from legitimate calls and AT&T has the common carrier duty to complete them." Does AT&T distinguish between calls delivered to AT&T by LECs with a screen code indicating an AT&T pay phone versus a screen code indicating a privately owned pay

telephone? If the LECs pass appropriate screen codes with the originating call, please explain why such calls are not distinguishable from legitimate calls.

Response: No. As described in response to Question No. 3 above, AT&T has developed elaborate procedures to respond to billing restrictions in conjunction with operator handled telephone calls. These restrictions do not apply in the context of 1+ or 10XXX1+ calls. Calls that do not traverse an operator system will be completed by the AT&T network even though they carry an ANI 07 II digits. AT&T simply has no way of ascertaining on a 1+ or 10XXX1+ call whether or not the pay phone owner has authorized or permitted the placing of that call. AT&T's records indicate that a majority of Mr. Wade's disputed calls were 1+ international dialed calls. Calls dialed 1+ do not pass through AT&T's operators or OSPs; they are direct dialed and pass from the LEC to AT&T's 4ESS with no operator intervention.

7. In the same paragraph referenced in 6 above, AT&T states "Customers, (meaning pay telephone providers) on the other hand, may prevent these calls by controlling access to and egress from their telephone system." This is true. The pay telephone provider could block all forms of access to AT&T, including zero minus and 10288+0 calls. Please explain AT&T's statement and reconcile it with AT&T's efforts at the state and federal level to ensure that all end users have access to AT&T. Does AT&T recommend this form of controlling access to and egress from private pay telephones? If not, what form of controlling access to and egress from private pay telephones does AT&T advocate?

Response: AT&T means the following by that statement: Many pay phones are considered "smart sets" and can control the types of calls that are processed from them. Also, pay phone providers can order blocking services from the LECs in Florida.

In addition, the following steps could also be included by a pay phone owner: (a) exercising reasonable care in the selection of locations at which it placed its pay telephones; (b) using adjunct toll restrictors; (c) periodically testing its telephones to determine the efficacy of any fraud controls which it may have used; (d) protecting the physical integrity of its telephones and the inside wire which services these telephones; (e)

monitoring telephones at locations having a high incidence of toll fraud; and (f) removing or relocating telephones at locations having a high incidence of toll fraud.

AT&T's statements and efforts to ensure that all end users have access to AT&T are totally consistent. Furthermore, AT&T's efforts and the FCC Order apply to the unblocking of 10XXX0+ access, not to 10XXX1+ or 10XXX011+ access. In fact, the FCC specifically excluded the unblocking of 10XXX1+ access because of its fraud potential. Also, in over two dozen state commission orders, 10XXX0+ access was ordered to be unblocked. The state commissions and the FCC recognized the need to block 10XXX1+ AND 10XXX011+, either through the CPE itself (ancillary devices, e.g., toll restrictors) or through LEC central office blocking services. There is no direct correlation between a form of access and fraud.

8. In paragraph (B) of the previously mentioned AT&T letter, AT&T states "If a customer wishes to prevent users from accepting collect calls at the customer's telephone, the customer may, among other protections 1) request their telephone equipment vendor to install an announcement to alert operators not to complete incoming collect calls, or 2) except for international calls, request toll billing exceptions from the Local Exchange Company." Part 2 of the previous sentence suggests that intrastate and interstate terminating collect toll calls can be avoided by the pay phone provider with the purchase of intrastate regulated billed number screening from the LEC. Please advise why AT&T appears to be billing Mr. Wade for such calls? With respect to AT&T's Tariff F.C.C. No. 1, Section 2.4 Responsibilities of the Customer, please indicate if the tariff language applicable to Mr. Wade has been mandated by the F.C.C. Please explain why AT&T cannot change the tariff to recognize the newly competitive pay telephone environment in effect today.

Response: AT&T is billing Mr. Wade for these calls because he is responsible for them pursuant to AT&T's tariffs. The tariff language applicable to Mr. Wade has not been mandated by the F.C.C.; however, it has been permitted by the FCC to be effective for a number of years.

AT&T believes that the language in AT&T's Tariff FCC No. 1 adequately reflects today's competitive environment and, in fact, places responsibilities

for the control of fraudulent calls on the customer, the person or entity, who is in the best position to control such fraud.

9. Please provide a copy of all comments made by AT&T to the F.C.C. related to originating line screening and billed number screening in CC Docket No. 91-35. Please include AT&T's position as to what jurisdiction the tariffs should be filed in and what jurisdictional calls should be screened.

Response: The appropriate documents are attached. Based on federal statutes, the FCC has jurisdiction for international and interstate calls. The Florida PSC has jurisdiction over Florida intrastate calls.

It is AT&T's contention that blocking and screening services should be readily available to all aggregators on an unbundled basis.

10. If the Florida Public Service Commission, through its enforcement program, requires hotels, motels and hospitals to unblock access to AT&T, will AT&T pursue collection of fraudulent calls from the hospitality industry, as it is the pay telephone industry, even if the hotels, motels and hospitals purchase originating line screening and billed number screening from the LEC? If so, please explain why the F.P.S.C. should pursue such enforcement. If not, please explain.

Response: AT&T will continue its efforts to collect tariffed charges from the responsible individual or entity. It will do so, however, in full accordance with rules and regulations established by the regulatory body which has jurisdiction over those tariffed charges.

The Florida PSC should pursue an enforcement policy which is in the best interest of the Florida consumer and which is based on reasonable responsibilities of the parties in the processing of the calls. It is clearly in the best interest of the Florida consumer that they have access to all locally available carriers, including AT&T.

As outlined, it is only reasonable that the parties involved in the processing of all calls be held responsible for their respective functions in the

call processing. Without a reasonable liability structure established, the industry will be left with many unresolved situations.